

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

TRACEY WHITE ET AL,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No.: 4:14CV01490 HEA
	)	
THOMAS JACKSON, ET AL,	)	
	)	
Defendants.	)	

***JOINT PROPOSED SCHEDULING ORDER***

Pursuant to Fed.R.Civ.P. 26(f) and this Honorable Court's April 16, 2015, Order Setting a Rule 16 Conference, an initial meeting of the parties was held on with attorneys for Plaintiffs and Defendants participating.

THE SCHEDULING AND DISCOVERY PLANS WERE DISCUSSED AMONG COUNSEL AND AGREED TO AS FOLLOWS:

1. The Track 2 Assignment for this case is appropriate.
2. Joinder of additional parties and amendment of the pleadings shall be made by May 27, 2015.
3. Initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1) shall be made by May 20, 2015.
4. At this time, there is no need to conduct discovery in phases or limit it to certain issues.
5. Expert witnesses shall be disclosed, along with a written report prepared and signed by the witness pursuant to Fed.R.Civ.P. 26(a)(2) as follows:

Plaintiff's expert(s): August 7, 2015;

Defendant's expert(s): October 9, 2015;

6. Depositions of expert witnesses must be taken by:

Plaintiff's expert(s): September 4, 2015; and

Defendant's expert(s): November 6, 2015.

7. The presumptive limits of ten (10) depositions per side as set forth in Fed.R.Civ.P. 30(a)(2)(A), and twenty-five (25) interrogatories per party as set forth in Fed.R.Civ.P. 33(a) should not apply in this case, due to the number of Plaintiffs and number of potential witnesses. The parties agree to set the limit on twenty depositions and fifty interrogatories per side, and the parties will meet and confer to the extent more are desired.

8. Physical or mental examinations of the plaintiffs pursuant to Fed.R.Civ.P. 35 may be requested by August 14, 2015 with the examination to be completed by September 4, 2015.

9. Discovery shall be completed by December 11, 2015.

10. Any motions to dismiss, motions for summary judgment, motions for judgment on the pleadings or, if applicable, any motion to exclude testimony pursuant to Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579 (1993) or Kuhmo Tire Co. Ltd v. Carmichael, 526 U.S. 137 (1999), shall be filed no later than January 8, 2016. Any response shall be filed no later than February 5, 2016. Any reply shall be filed no later than February 19, 2016.

11. The parties agree to participate in mediation and such mediation would be most productive after September 4, 2015.

12. The earliest date this case will be ready for trial is April 11, 2016.

13. The parties expect the trial to last five to eight days.

/s/Peter J. Dunne

---

Peter J. Dunne #31482MO

Robert T. Plunkert #62064MO

PITZER SNODGRASS, P.C.

Attorneys for Defendants City of Ferguson,

Chief Thomas Jackson, and Officer Justin

Cosma

100 South Fourth Street, Suite 400

St. Louis, Missouri 63102-1821

(314) 421-5545

(314) 421-3144 (Fax)

I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 22<sup>nd</sup> day of April, 2015, to be served by operation of the Court's electronic filing system upon the following:

- Gregory L. Lattimer, Attorney for Plaintiffs, 1200 G. Street, N.W., Suite 800, Washington, D.C. 20005, [lattlaw@aol.com](mailto:lattlaw@aol.com);
- Malik Z. Shabazz, Attorney for Plaintiffs, 1200 G. Street, N.W., Suite 800, Washington, D.C. 20005, [attorneyshabazz@yahoo.com](mailto:attorneyshabazz@yahoo.com);
- Reginald A. Green, Attorney for Plaintiffs, One Georgia Center, Suite 605, 600 West Peachtree Street, N.W., Atlanta, Georgia 30308, [rgreene@greenelegalgroup.com](mailto:rgreene@greenelegalgroup.com); and
- Michael E. Hughes, Attorney for Defendants St. Louis County and Chief Jon Belmar, 41 S. Central Ave, Clayton MO 63105, [mhughes2@stlouisco.com](mailto:mhughes2@stlouisco.com), [pgunn@stlouisco.com](mailto:pgunn@stlouisco.com).

/s/ Peter J. Dunne

---